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July 29, 2014

**Freedom of Information Act Request**

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**U.S. Environmental Protection Agency**  
Region 4 Freedom of Information  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, GA 30303-8960

Re: Amber D. Ellis, as Personal Representative of the Estate of Jacqueline Goodson  
v. AstenJohnson, Inc., et al.  
Broward County Case No.: 12-30748

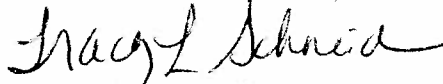
Dear Sir or Madam:

Our firm is involved in the above-referenced matter and we are requesting copies of all asbestos abatement records pertaining the Palatka Pulp & Paper Operations, a/k/a Hudson Pulp & Paper Corporation Mill, a/k/a Georgia-Pacific Corporation, Palatka Operation, located at 215 County Road 216, Palatka, Florida.

Please see the attached schedule "A" for detail list of the record request. Please forward copies of all documents, fee not to exceed \$100.00. If the cost for duplication and shipping is over that amount, please call my office for further authorization.

Thank you for your prompt attention to this matter

Very truly yours,  
BICE COLE LAW FIRM, P.L.



Tracy Schneider, FRP  
Paralegal

/tls  
Enclosure

## **SCHEDULE "A"**

### **DOCUMENTS REQUESTED**

1. Any and all records and documents regarding the use and presence of asbestos-containing products from 1966 through 1998.
2. Any and all records and documents regarding the presence of asbestos-containing products which had already been installed but were still present as of 1998.
3. Any and all documents listing or describing the outside or independent contractors and crews that inspected, maintained, repaired, overhauled, constructed, demolished, or built any asbestos-containing products from 1966 through 1998.
4. Any and all records, documents, and contracts from contractors, crews, and firms that installed or performed repairs from 1966 to 1998.
5. Any and all maintenance and repair records, including but not limited to job tickets, certificates, certifications, work orders, schematics, inspection logs, boiler logs, maintenance logs, and personnel logs of asbestos-containing products from 1966 through 1998.
6. Any and all purchase orders, requisition slips, distribution records, work orders, blue prints, and mechanical drawings regarding the installation of asbestos-containing products from 1966 to 1998.
7. Any and all purchase orders, requisition slips, distribution records, work orders, blue prints, and mechanical drawings regarding the removal of asbestos-containing products, including but not limited to boilers, turbines, pumps, or generators 1966 to 1998.
8. Any as-built drawings, mechanical drawings, and blueprints showing the location, amount, or use of asbestos-containing materials from 1966 to 1998.
9. Any and all OSHA reports, violations, inspections, warnings, and/or fines for the presence, use, installation, removal, storage, isolation, and containment of asbestos-containing materials from 1966 to 1998.
10. Any and all industrial hygiene reports regarding the extent, absence, presence, amount, type, and/or percentage of asbestos 1966 to 1998.
11. Any and all records, documents, blueprints, diagrams, progress reports, progress payment records, and contracts from all asbestos abatement contractors from 1966 to the present.
12. Any and all workers' compensation records alleging or claiming asbestos-related pulmonary or respiratory injuries 1966 to 1998.